



**Brown & Root Environmental**

CPT

12.04-7/1/96-02408

Background  
Technical Note

**TO: Ms. Gena Townsend**  
**Ms. Orathai Gossage**

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**FROM: Mr. Greg Zimmerman**

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We have received at least 2 comments on the Draft PRAP and ROD for OU3 concerning the latest guidance for preparing PRAPs and RODs.

- EPA's comment - "This Record of Decision is following the format for a private site, (EPA is the author and signatory of those documents). Changes have been made to the standard format (wording) to meet the requirements for Federal Facility Sites. (See a copy of the Camp Lejeune ROD's)."

Note: The guidance used by Brown & Root during the preparation of the Draft PRAP and ROD did not distinguish between Private Sites and Federal Facilities.

- Orathai Gossage's comment - "Modify the ROD to reflect the most current EPA guidance on content and format. PRAP and ROD should be stand alone documents."

We have attached copies of the Cover Pages for the Guidance Documents that we used during the preparation of the Draft PRAP and ROD for OU3. In addition, we have attached a copy of the Cover Page of an example ROD that we used to determine the level of detail to include in the Documents.

Can you please tell us if these are the most recent guidance documents or identify the most recent guidance documents?

copies: M. Cochran - Brown & Root Environmental  
D. Hutson - Brown & Root Environmental  
G. McSmith - LANTDIV  
R. Henderson - MCAS Cherry Point  
L. Raynor - State of North Carolina

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Superfund



# Guidance on Preparing Superfund Decision Documents

REC'D

2/25/92

FROM W. ISNER

Preliminary Draft

VP text -  
ROD

OSWER 9355.3-02

VP text

JAN 1992 DRAFT

RODS

"GUIDANCE ON PREPARING SUPERFUND  
DECISION DOCUMENTS"

OSWER 9355.3-02

VP text

JAN. 1992 DRAFT

RODS

GUIDANCE ON PREPARING SUPERFUND  
DECISION DOCUMENTS

LIBURTON NUS Technical Library  
Foster Plaza VII  
Pittsburgh, PA 15220

HALLIBURTON NUS Technical Library  
Foster Plaza VII  
Pittsburgh, PA 15220



# A Guide to Developing Superfund Proposed Plans

Office of Emergency and Remedial Response  
Hazardous Site Control Division

Quick Reference Fact Sheet

Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, requires preparation of Proposed Plans as part of the site remediation process. The Proposed Plan is prepared after the Remedial Investigation/Feasibility Study (RI/FS) is completed and is made available with the RI/FS to the public for comment. The Proposed Plan highlights key aspects of the RI/FS, provides a brief analysis of remedial alternatives under consideration, identifies the preferred alternative, and provides members of the public with information on how they can participate in the remedy selection process. A notice and brief analysis of the Proposed Plan is published in a major local newspaper of general circulation. In addition, the Proposed Plan, the RI/FS, and the other contents of the Administrative Record are available at an information repository near the site.

This guide outlines the major components of the Proposed Plan and suggests effective ways in which the various sections can be presented. EPA recommends issuing the Proposed Plan in a fact sheet format. For some highly complex sites or remedies, more detailed Plans may be appropriate. All Proposed Plans should be written in a style that makes the material easy for the public to understand and should emphasize that the preferred alternative identified in the Proposed Plan is a preliminary determination, and that the Agency is requesting comments on all of the alternatives.

Detailed guidance on the preparation of the Proposed Plan is provided in Chapters 2, 3, and 9 of the "Interim Final Guidance on Preparing Superfund Decision Documents" (the "ROD Guidance") (OSWER Directive 9335.3-02, November 1989, EPA/540/G-89/007).

## Introduction

Begin with a statement of the document's purpose. This introduction should state the site name and location, identify the lead and support agencies, and state that the Proposed Plan:

- Fulfills the requirements of CERCLA section 117(a);
- Describes the remedial alternatives analyzed for the site or operable unit;
- Identifies the preferred alternative and explains the rationale for the preference;
- Highlights key information in the RI/FS and administrative record, to which the reader is referred for further details;
- Solicits community involvement in the selection of a remedy; and
- Invites public comment on all alternatives.

## Site Background

Provide a brief description of the site, including:

- History of site activities that led to current problems at the site; and
- The site area or media to be addressed by the selected remedy.

Figure 1 is an example of a site map that could be included.

## Scope and Role of Operable Unit or Response Action

- Identify the principal threats posed by conditions at the site; and

- Describe the scope of the problems addressed by the preferred alternative and its role within the overall site clean-up strategy.

## Summary of Site Risks

- Provide a brief overview of the baseline risk assessment, including the contaminated media, contaminants of concern, exposure pathways and populations, and potential or actual risks;
- Describe how current risks compare with remediation goals; and
- Discuss environmental risks, as appropriate.

## Summary of Alternatives

Describe briefly each of the alternatives evaluated in the detailed analysis of the FS. Highlight the following:

- Treatment components;
- Engineering controls (noting the type of containment controls); and
- Institutional controls.

Quantities of waste and implementation requirements related to each component should be noted, as well as major applicable or relevant and appropriate requirements (ARARs), the estimated construction, and operation and maintenance (O&M) costs (also expressed in present worth), and the implementation time of each alternative. Emphasize that these latter two evaluations are estimates. An example is presented in **Highlight 1**.

**Department of the Navy****Logo Goes Here****Proposed Plan****Naval Air Warfare Center  
Warminster, Pennsylvania****April 1993****NAVY ANNOUNCES PROPOSED PLAN**

The Department of Navy has completed a Focused Feasibility Study (FFS) addressing the shallow groundwater of the Naval Air Warfare Center (NAWC) in Warminster, Pennsylvania. The purpose of the FFS was to evaluate remedial alternatives for shallow groundwater underlying a portion of the facility. This Proposed Plan summarizes the FFS report, identifies the alternative preferred by the Navy and the Environmental Protection Agency (EPA), and explains the reasons for this preference. In addition, the Plan explains how the public may participate in the decision-making process and provides addresses and telephone numbers for the appropriate Navy contacts.

This document is issued by the Navy, the lead agency for site activities, and EPA, the support agency for this response action. The Navy, in consultation with EPA, will select an interim remedy for shallow groundwater after the public comment period has ended and the comments submitted during this time have been reviewed and considered.

The Navy is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act. This document summarizes information that can be found in greater detail in the FFS and Remedial Investigation (RI) Reports and other site documents contained in the administrative record file for this site. The Navy invites the public to review the materials available and to comment on the Proposed Plan during the public comment period.

The Navy, in consultation with EPA, may modify the preferred alternative or select another action presented in this Plan or the FFS Report, based on new information or public comments. The public is encouraged to review and comment on all the alternatives identified here.

**DATES TO REMEMBER**

**April 19 - May 19, 1993:**  
Public comment period on remedies to control contaminated groundwater.

**April 27, 1993:**  
Public meeting at Nameless Town Hall,  
123 Market Street, Warminster, PA at  
7:00 p.m.

The administrative record file is available at these locations:

NAWC Warminster  
Jacksonville Road  
Warminster, Pennsylvania 18974  
(215) 441-1032

Hours: Monday - Friday, 9 a.m. - 4 p.m.

Warminster Township Library  
1076 Emma Lane  
Warminster, Pennsylvania 18974  
(215) 672-4362

Hours: Monday - Thursday, 10 a.m. - 9 p.m.  
Saturday, 10 a.m. - 4 p.m.

The interim remedy for shallow groundwater will be selected in a Record of Decision (ROD), which will also be available at the local repositories.

A glossary of relevant technical and regulatory terms is provided at the end of this Plan.

**FINAL**

**INTERIM RECORD OF DECISION  
CONTAMINATED SOIL  
OPERABLE UNIT NO. 10  
SITE 35 - CAMP GEIGER AREA FUEL FARM**

**MARINE CORPS BASE  
CAMP LEJEUNE, NORTH CAROLINA**

**CONTRACT TASK ORDER 0160**

**AUGUST 31, 1994**

*Prepared For:*

**DEPARTMENT OF THE NAVY  
ATLANTIC DIVISION  
NAVAL FACILITIES  
ENGINEERING COMMAND  
*Norfolk, Virginia***

*Under:*

**LANTDIV CLEAN Program  
Contract N62470-89-D-4814**

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